Attention: Director, Transport Assessments
Planning & Assessment, Department of Planning
Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

PLEASE DELETE MY PERSONAL DETAILS BEFORE PUBLICATION

1 March 2021

Objection: Beaches Link and Gore Hill Freeway Upgrade – SSI_8862

I object to this project, particularly due to the significant negative impact in and threat to our native bushland and diversity that will result due to the placement of the dive site for the proposed Beaches Link Tunnel at the top eastern part of Flat Rock Gully (which lies between Naremburn and Northbridge) and the use of Clive Park and Middle Harbour as a construction site for an immersion tunnel. The tunnel works will result in the clearing of over 16 acres of bushland habitat at the top of the catchment with flow on effects to the rest of the gully, Tunks Park, Middle Harbour, the Sailors Bay foreshores, and local and regional north-south and east-west corridors.

I have lived in Castlecrag for 20 plus years and as a bush regenerator member of a Bushcare group run by Willoughby City Council and a bush walker I have a knowledge and interest and passion for the bushland that will be affected by this proposal particularly at Flat Rock Gully but also at Clive Park.

I strongly object to the dive site for this project being on the eastern side of Flat Rock Gully for the following reasons:

- 1. I object to the clearance of a large area of much valued and biodiverse bushland and habitat on the eastern side of Flat Rock Gully for a dive site for the proposed tunnel reconstruction. The proposal outlined in the EIS is that all bushland and trees on the plateau above Flat Rock Gully equal to around 6.77 hectares (over 16 acres) be cleared (EIS p19.6). This beautiful bushland currently provides an important wildlife corridor as well as a wonderful bushland space so close to the city for bushwalkers and picnickers. The regeneration of this land, formerly a Council rubbish tip, has been a 25 year project for Willoughby City Council and the local community. It has been hailed far and wide as an environmental and community success story. The EIS plays down the ecological importance of this area and attempts to justify the removal of the bush and trees on the basis that it is only 'regenerated land' having been introduced to cover a tip formerly on this site. This land has been propagated from cuttings taken from local indigenous plants and as I said above is the result of 25 years work. Its success as habitat for native wildlife is clear. Besides there is no evidence given in the EIS that wildlife discriminates between regenerated and remnant indigenous trees and bushland.
- 2. I object to over 240 trees on the Flat Rock Gully dive site being removed or otherwise being directly impacted in the construction of the dive site at Flat Rock Gully. Willoughby City council Tree Policy requires three trees be replaced for each tree removed and the NSW Government urges local tree policies reflect the needs of different areas for tree canopy, wildlife habitat and to combat the problems of rising urban heat/climate change.
- 3. I object to the loss of flora and fauna resulting from the clearing of the eastern side of Flat Rock Gully for a dive site for the proposed tunnel reconstruction. The EIS argues that the removal at Flat Rock Gully of habitat, 'would be negligible since the habitat to be removed does not comprise a significant proportion of habitat available to species in the surrounding terrestrial biodiversity locality or wider bioregion.' This very broad statement implies that, with little effort, the threatened species and other fauna will move away. The EIS also states the intention that the site be visited 24 hours before construction commences to capture and relocate any fauna sighted. This approach ignores that:

- the habitat removal will have an impact on hundreds more species than those listed as threatened under the relevant Acts;
- this area provides water for local fauna;
- many species may not have the ability or instinct to move from the area;
- attempts at capture are likely to be futile and possibly injurious to the species involved;
- many are territorial and risk injury or death by moving to other territories;
- this is just one in a number of removals of small patches of local bushland, on public and private land, which is gradually rendering many species locally extinct.

Flat Rock Gully Reserve is also a key part of the network of wildlife corridors across Sydney required to maintain its diversity. It is a major and central component of the east-west wildlife corridor from Middle Harbour and Lane Cove River Catchments. On a regional scale, Flat Rock Reserve is part of a significant east-west wildlife corridor which winds from Berowra Valley National Park through to the shores of Middle harbour, Northbridge as well as linking up to the north with Garigal and Ku-ring-gai National Parks and Hawkesbury River. This degree of habitat connectivity at a landscape scale, exerts substantial influence on the biodiversity of bird life and other fauna still present in the Willoughby LGA.

Apart from this horrible desecration of Flat Rock Gully Reserve and the resulting loss of habitat and fauna and flora loss caused by its use as a dive site for construction of the proposed Beaches Link Tunnel, the project is a missed opportunity to transform Sydney into a world class, healthy and sustainable city with a strong public transport system. The EIS demonstrates that this toll road will be extremely expensive to build and high risk with little benefit. I would ask that an alternative public transport feasibility study be published before any further planning occurs so that impacts and outcomes can be fairly compared.

Yours sincerely	,

Declaration of any reportable political donations
made in the previous two years: I have not made any
reportable political donations in the past two years.

Signed: